



Privacy Impact Assessment

Biotechnology Inspection Database System (BIDS)

Revision: 1.3

*Animal and Plant Health Inspection
Service (APHIS), Biotechnology
Regulatory Services (BRS)*

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1 System Information

System Information	
Agency:	Animal and Plant Health Inspection Service (APHIS), Biotechnology Regulatory Services (BRS)
System Name:	Biotechnology Inspection Database System (BIDS)
System Type:	<input checked="" type="checkbox"/> Major Application <input type="checkbox"/> General Support System <input type="checkbox"/> Non-major Application
System Categorization (per FIPS 199):	<input type="checkbox"/> High <input checked="" type="checkbox"/> Moderate <input type="checkbox"/> Low
Description of System:	<p>BIDS is a database application used to facilitate data collection, reporting and analysis for the inspection and compliance of USDA regulations relating to growth of Genetically Engineered (GE) crops. This system was designed and created concurrently with the development of the compliance section of BRS, and was designed to capture various applicant reports, assist in the planning of inspections and help with compliance issues.</p> <p>The BIDS system consists of a centralized Oracle database server with a Microsoft front-end application server. The Oracle 9i database runs on the IBM AIX 5.2 operating system, and the Microsoft Access front-end application runs on the Windows XP operating system. Specific components include:</p> <ul style="list-style-type: none">• The Oracle 9i database server, mdrdoras57, which is hosted at the APHIS-Riverdale Data Center,• The BIDS Microsoft Access client application which resides on Windows XP Professional workstations connected to the BIDS Oracle database server <p>The BIDS system is hosted on the APHIS network infrastructure, and the database server is hosted at the APHIS Data Center in Riverdale, Maryland. Some of the information contained within the BIDS system is considered Confidential Business Information (CBI). BIDS users connect to the centralized Oracle Database server using the Microsoft Access front-end application via Open Database Connectivity (ODBC) over the Local Area Network (LAN).</p> <p>Individual customers input permit and notification applications into the Agency's ePermits System. The principal purpose of the data collection is to receive, retrieve, and review applications for APHIS permitting, notification, and inspection activities. The BIDS system receives a nightly data extract of permit, notification, and inspection information from ePermits.</p>



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Who owns this system? (Name, agency, contact information)	Thomas Sim Animal and Plant Health Inspection Service (APHIS), Biotechnology Regulatory Services (BRS) 4700 River Road, Riverdale, MD 20737-1234 Telephone Number: 301-734-5301
Who is the security contact for this system? (Name, agency, contact information)	Linda Pardoe Animal and Plant Health Inspection Service (APHIS), Biotechnology Regulatory Services (BRS) 4700 River Road, Riverdale, MD 20737-1234 Telephone Number: 301-734-5299
Who completed this document? (Name, agency, contact information)	Judy Garrison Animal and Plant Health Inspection Service (APHIS), Biotechnology Regulatory Services (BRS) 4700 River Road, Riverdale, MD 20737-1234 Telephone Number: 301-734-5769

2 Data Information

2.1 Data Collection

No.	Question	Response
1	Generally describe the data to be used in the system.	<p>Compliance data such as GPS coordinates geographical locations, incident identification numbers, incident locations, inspection identification numbers, inspection types, inspector information, compliance tracking numbers, etc.</p> <p>Additionally, permits information is fed into the BIDS System directly from the ePermits System. In the fall of 2008, the compliance function of BIDS (all of BIDS) was migrated into the ePermits System. So, as of October 2008, all compliance data is now captured in the ePermits System.</p> <p>However, the BIDS System still contains all the compliance data prior to October 2008. Over the next several years, as the multi-year permits and notifications expire, BRS will no longer need the BIDS System.</p> <p>For now, BRS still needs to rely on the BIDS System to track data to schedule inspections and record results on permits prior to October 2008</p>
2	Does the system collect Social Security Numbers (SSNs) or Taxpayer Identification Numbers (TINs)?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No – If NO, go to question 3.
2.1	State the law or regulation that requires the collection of this information.	
3	Is the use of the data both relevant and necessary to the purpose for which the system is being designed? In other words, the data is absolutely needed and has significant and demonstrable bearing on the system's purpose as required by statute or by Executive order of the President.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
4	Sources of the data in the system.	The information on the permits and notifications (low risk permits) comes directly from the ePermits System into BIDS. In addition, BIDS users can directly input inspection and compliance information.
4.1	What data is being collected from the customer?	Information from the customer such as permit number, geographical locations, names of individuals and/or companies, and information related to applications for permits and notifications comes into the Agency via the ePermits System.
4.2	What USDA agencies are providing data for use in the system?	APHIS



No.	Question	Response
4.3	What state and local agencies are providing data for use in the system?	None
4.4	From what other third party sources is data being collected?	No third party sources outside the agency.
5	Will data be collected from sources outside your agency? For example, customers, USDA sources (i.e., NFC, RD, etc.) or Non-USDA sources.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No – If NO, go to question 6.
5.1	How will the data collected from customers be verified for accuracy, relevance, timeliness, and completeness?	
5.2	How will the data collected from USDA sources be verified for accuracy, relevance, timeliness, and completeness?	
5.3	How will the data collected from non-USDA sources be verified for accuracy, relevance, timeliness, and completeness?	

2.2 Data Use

No.	Question	Response
6	Individuals must be informed in writing of the principal purpose of the information being collected from them. What is the principal purpose of the data being collected?	This information is used to track inspection and compliance information associated with the permits/notifications.
7	Will the data be used for any other purpose?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No – If NO, go to question 8.
7.1	What are the other purposes?	
8	Is the use of the data both relevant and necessary to the purpose for which the system is being designed? In other words, the data is absolutely needed and has significant and demonstrable bearing on the system's purpose as required by statute or by Executive order of the President	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
9	Will the system derive new data or create previously unavailable data about an individual through aggregation from the information collected (i.e., aggregating farm loans by zip codes in which only one farm exists.)?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No – If NO, go to question 10.
9.1	Will the new data be placed in the individual's record (customer or employee)?	<input type="checkbox"/> Yes <input type="checkbox"/> No
9.2	Can the system make determinations about customers or employees that would not be possible without the new data?	<input type="checkbox"/> Yes <input type="checkbox"/> No



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No.	Question	Response
9.3	How will the new data be verified for relevance and accuracy?	
10	Individuals must be informed in writing of the routine uses of the information being collected from them. What are the intended routine uses of the data being collected?	This information is used to track inspection and compliance information associated with the permits/notifications.
11	Will the data be used for any other uses (routine or otherwise)?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No – If NO, go to question 12.
11.1	What are the other uses?	
12	Automation of systems can lead to the consolidation of data – bringing data from multiple sources into one central location/system – and consolidation of administrative controls. When administrative controls are consolidated, they should be evaluated so that all necessary privacy controls remain in place to the degree necessary to continue to control access to and use of the data. Is data being consolidated?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No – If NO, go to question 13.
12.1	What controls are in place to protect the data and prevent unauthorized access?	Each BRS member with access to BIDS is aware of the requirement to protect all information related to BIDS permits, negotiations, and inspections as part of their sensitive position responsibilities. BIDS is located in the APHIS River Road facility, which is protected by security guards and/or intrusion alarm systems. Access to BIDS is limited to those employees of the agency who have an official need for access in order to perform their duties and is controlled through APHIS' internal network which requires password validation prior to use. The system employs role-based access control requiring user authentication (a User ID and password) to gain access to the system. Access is based on a predetermined role that allows least privilege access to BIDS data. The required use of password protection identification features and other system protection methods further restrict access. Records are maintained in areas accessible only to authorized personnel. Paper Records are secured in locked cabinets during off hours and access to electronic records is restricted by the use of passwords. Printed material is marked For SBU. Printed material is disposed of by either placement in a burn bag or shredding. Audio and video tapes have the tape removed and then shredded. CDs and DVDs are disposed of in a USDA-prescribed manner. Information in this system is safeguarded in accordance with applicable laws, rules, and policies, including USDA and APHIS' automated systems security and access policies.

No.	Question	Response
13	Are processes being consolidated?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No – If NO, go to question 14.
13.1	What controls are in place to protect the data and prevent unauthorized access?	

2.3 Data Retention

No.	Question	Response
14	Is the data periodically purged from the system?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No – If NO, go to question 15.
14.1	How long is the data retained whether it is on paper, electronic, in the system or in a backup?	
14.2	What are the procedures for purging the data at the end of the retention period?	
14.3	Where are these procedures documented?	
15	While the data is retained in the system, what are the requirements for determining if the data is still sufficiently accurate, relevant, timely, and complete to ensure fairness in making determinations?	Random audit checks are performed, comparing permit information taken from the BIDS system with comparable data in the ePermits System. When scheduling inspections for field test sites, the information from the BIDS system is also checked against the ePermits system.
16	Is the data retained in the system the minimum necessary for the proper performance of a documented agency function?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No

2.4 Data Sharing

No.	Question	Response
17	Will other agencies share data or have access to data in this system (i.e., international, federal, state, local, other, etc.)?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No – If NO, go to question 18.
17.1	How will the data be used by the other agency?	
17.2	Who is responsible for assuring the other agency properly uses the data?	
18	Is the data transmitted to another agency or an independent site?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No – If NO, go to question 19.



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No.	Question	Response
18.1	Is there appropriate agreement in place to document the interconnection and ensure the PII and/or Privacy Act data is appropriately protected?	
19	Is the system operated in more than one site?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No – If NO, go to question 20.
19.1	How will consistent use of the system and data be maintained in all sites?	Consistent use of the system is assured through the use of the BIDS user manual. All users are to be issued the user manual. Follow-up training is provided, if necessary.

2.5 Data Access

No.	Question	Response
20	Who will have access to the data in the system (i.e., users, managers, system administrators, developers, etc.)?	Users such as biotechnologists, compliance specialists and assistants, systems managers, and document management specialists
21	How will user access to the data be determined?	User access is on an as-needed basis, in discussion with the BRS ISSO and supervisor of the employee. System authorization and Access Request (SAAR) Forms are completed by the employee and signed and submitted to the BRS ISSO who reviews, and signs for approval.
21.1	Are criteria, procedures, controls, and responsibilities regarding user access documented?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
22	How will user access to the data be restricted?	ISSO reviews all requests for access to BIDS system. User authentication for this system as well as underlying operating systems relies on username/password authentication. Password construction conforms to the rules outlined in the “ BIDS Security Feature User’s Guide ” and the APHIS Password Policy.
22.1	Are procedures in place to detect or deter browsing or unauthorized user access?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
23	Does the system employ security controls to make information unusable to unauthorized individuals (i.e., encryption, strong authentication procedures, etc.)?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No

2.6 Customer Protection

No.	Question	Response
24	Who will be responsible for protecting the privacy rights of the customers and employees affected by the interface (i.e., office, person, departmental position, etc.)?	Regulatory Operations Programs/Resource Management Programs, BRS
25	How can customers and employees contact the office or person responsible for protecting their privacy rights?	Contact BRS main line at (301)734-7324. Again, the customer information comes from the ePermits System.
26	A "breach" refers to a situation where data and/or information assets are unduly exposed. Is a breach notification policy in place for this system?	<input checked="" type="checkbox"/> Yes – If YES, go to question 27. <input type="checkbox"/> No
26.1	If NO, please enter the Plan of Action and Milestones (POA&M) number with the estimated completion date.	
27	Consider the following: <ul style="list-style-type: none"> Consolidation and linkage of files and systems Derivation of data Accelerated information processing and decision making Use of new technologies Is there a potential to deprive a customer of due process rights (fundamental rules of fairness)?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No – If NO, go to question 28.
27.1	Explain how this will be mitigated?	
28	How will the system and its use ensure equitable treatment of customers?	Each BRS member with access to BIDS is aware of the requirement to protect all information related to BIDS information as part of their sensitive position responsibilities. Independent audits are performed
29	Is there any possibility of treating customers or employees differently based upon their individual or group characteristics?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No – If NO, go to question 30
29.1	Explain	



3 System of Record

No.	Question	Response
30	Can the data be retrieved by a personal identifier? In other words, does the system actually retrieve data by the name of an individual or by some other unique number, symbol, or identifying attribute of the individual?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No – If NO, go to question 31
30.1	How will the data be retrieved? In other words, what is the identifying attribute (i.e., employee number, social security number, etc.)?	
30.2	Under which Systems of Record (SOR) notice does the system operate? Provide number, name and publication date. (SORs can be viewed at www.access.GPO.gov .)	
30.3	If the system is being modified, will the SOR require amendment or revision?	<input type="checkbox"/> Yes <input type="checkbox"/> No



4 Technology

No.	Question	Response
31	Is the system using technologies in ways not previously employed by the agency (e.g., Caller-ID)?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No – If NO, the questionnaire is complete.
31.1	How does the use of this technology affect customer privacy?	



5 Completion Instructions

Upon completion of this Privacy Impact Assessment for this system, the answer to OMB A-11, Planning, Budgeting, Acquisition and Management of Capital Assets, Part 7, Section E, Question 8c is:

1. Yes.

PLEASE SUBMIT A COPY TO THE OFFICE OF THE ASSOCIATE CHIEF
INFORMATION OFFICE FOR CYBER SECURITY.



Privacy Impact Assessment Authorization

Memorandum

I have carefully assessed the Privacy Impact Assessment for the

Biotechnology Inspection Database System (BIDS)

This document has been completed in accordance with the requirements of the E-Government Act of 2002.

We fully accept the changes as needed improvements and authorize initiation of work to proceed. Based on our authority and judgment, the continued operation of this system is authorized.

Michael Gregoire
BRS Deputy Administrator

Date

System Manager/Owner
OR Project Representative
OR Program/Office Head.

Date

Agency's Chief FOIA officer
OR Senior Official for Privacy
OR Designated privacy person

Date

Agency OCIO

Date

ISSPM

Date